



Air Quality Permitting Response to Public Comments

January 10, 2017

Permit to Construct No. P-2016.0020

Project No. 61700

**TESORO LOGISTICS OPERATIONS LLC – POCATELLO
TERMINAL
POCATELLO, Idaho**

Facility ID No. 077-00023

Prepared by:
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AIR QUALITY DIVISION

Final

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BACKGROUND

The Idaho Department of Environmental Quality (DEQ) provided for public comment on the proposed permit to construct for Tesoro Logistics Operations LLC from November 29, 2016 through December 29, 2016, in accordance with IDAPA 58.01.01.209.01.c. During this period, comments were submitted in response to DEQ's proposed action. Each comment and DEQ's response is provided in the following section. All comments submitted in response to DEQ's proposed action are included in the appendix of this document.

PUBLIC COMMENTS AND RESPONSES

Public comments regarding the technical and regulatory analyses and the air quality aspects of the proposed permit are summarized below. Questions, comments, and/or suggestions received during the comment period that did not relate to the air quality aspects of the permit application, the Department's technical analysis, or the proposed permit are not addressed. For reference purposes, a copy of the Rules for the Control of Air Pollution in Idaho can be found at: <http://adminrules.idaho.gov/rules/current/58/0101.pdf>.

Comment 1:

The EPA is working on regulatory actions that will curb the emissions of methane, smogforming VOCs, and toxic air pollutants in an effort to reduce impacts from climate change and better protect public health. The oil and gas industry is the largest industrial source of many of these pollutants.

Of all these regulated pollutants, methane in particular is an extremely potent greenhouse gas. In fact, methane's global warming potential is 25 times that of carbon dioxide. Additionally, a 2016 study by Schwietzke et al. revealed that methane emissions from oil and gas operations are 20 to 60 percent greater than current predicted estimates. Given these factors, it is clear that methane deserves a level of scrutiny equal to that of criteria air pollutants when regulating agencies take action with regards to air permitting.

In light of this, we are concerned at the scarce discussion surrounding methane emissions from this facility. DEQ's Statement of Basis (SOB) quantifies post-project emissions of CO₂ equivalent (CO₂e) pollutants – which, if not already so, should include methane – yet provides little discussion surrounding the controls or reduction efforts regarding these CO₂e emissions.

Given its potency we believe methane emissions should be reported on an individual basis similar to the other criteria pollutants as well as being included as a portion of the CO₂e emissions. In addition, in June of 2016 the EPA issued final updates to the New Source Performance Standards (NSPS) aimed at curbing emissions of methane and VOCs from new, modified, and reconstructed sources in the oil and gas industry. One of the updates to the NSPS is the requirement to quantify fugitive emissions of methane as a result of leaky equipment. We believe it would be prudent as part of this permitting process to estimate fugitive methane emissions from leaky equipment. If not explicitly required now, this may be necessary for future permitting actions, therefore completing this estimate now would provide quality baseline data to guide future management efforts.

Response 1:

The applicant provided DEQ with the required emissions inventory for Greenhouse Gas Emission (GHG) in the form of CO₂e (CO₂ equivalent). The applicant also provided the supporting calculation summaries of individual GHG pollutants, including CO₂ (carbon dioxide), CH₄ (methane), and N₂O (nitrous oxide). These calculations are located in Appendix C of the applicants permit application.

Comment 2:

A comment was received stating that Tesoro's facility, located in Pocatello, appears to be subject to EPA's Toxic Release Inventory (TRI) annual reporting requirements. The comment also suggests the facility may not have followed these federal requirements.

Response 2:

EPA is the regulatory agency which implements this program and any comments or inquiries regarding the compliance status of this facility with regard to the TRI reporting process should be directed to EPA.

Appendix

Public Comments Submitted for

Permit to Construct No. P-2020.0020

Project No. 61700



208.345.6933 • PO Box 844 Boise, ID 83702 • www.idahoconservation.org

12/21/2016

Anne Drier
Air Quality Division
DEQ State Office
1410 N. Hilton
Boise, ID 83706

Craig Woodruff
Air Quality Division
DEQ State Office
1410 N. Hilton
Boise, ID 83706

Submitted via email: anne.drier@deq.idaho.gov and craig.woodruff@deq.idaho.gov

RE: Proposed Permit to Construct No. P-2016.0020 for Tesoro Logistics Operations

Dear Ms. Drier and Mr. Woodruff,

Thank you for the opportunity to comment on the proposed air quality permit to construct for Tesoro Logistics Operations in Pocatello, ID.

Since 1973, the Idaho Conservation League has been Idaho's leading voice for clean water, clean air and wilderness—values that are the foundation for Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent over 25,000 supporters, many of whom have a deep personal interest in protecting Idaho's air quality.

Our detailed comments follow this letter. Please do not hesitate to contact me at 208-345-6933 ext. 23 or ahopkins@idahoconservation.org if you have any questions regarding our comments or if we can provide you with any additional information on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Austin Hopkins".

Austin Hopkins
Conservation Assistant

RE: Idaho Conservation League comments on proposed permit to construct No. P-2016.0020 for Tesoro Logistics Operations

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Methane Emissions

The EPA is working on regulatory actions that will curb the emissions of methane, smog-forming VOCs, and toxic air pollutants in an effort to reduce impacts from climate change and better protect public health. The oil and gas industry is the largest industrial source of many of these pollutants¹.

Of all these regulated pollutants, methane in particular is an extremely potent greenhouse gas. In fact, methane's global warming potential is 25 times that of carbon dioxide. Additionally, a 2016 study² by Schwietzke et al. revealed that methane emissions from oil and gas operations are 20 to 60 percent greater than current predicted estimates. Given these factors, it is clear that methane deserves a level of scrutiny equal to that of criteria air pollutants when regulating agencies take action with regards to air permitting.

In light of this, we are concerned at the scarce discussion surrounding methane emissions from this facility. DEQ's Statement of Basis (SOB) quantifies post-project emissions of CO₂ equivalent (CO₂e) pollutants – which, if not already so, should include methane – yet provides little discussion surrounding the controls or reduction efforts regarding these CO₂e emissions.

Given its potency we believe methane emissions should be reported on an individual basis similar to the other criteria pollutants as well as being included as a portion of the CO₂e emissions. In addition, in June of 2016 the EPA issued final updates to the New Source Performance Standards (NSPS) aimed at curbing emissions of methane and VOCs from new, modified, and reconstructed sources in the oil and gas industry. One of the updates to the NSPS is the requirement to quantify fugitive emissions of methane as a result of leaky equipment. We believe it would be prudent as part of this permitting process to estimate fugitive methane emissions from leaky equipment. If not explicitly required now, this may be necessary for future permitting actions, therefore completing this estimate now would provide quality baseline data to guide future management efforts.

Submission to TRI per Section 313 of EPCRA

Section 313 of the Emergency Planning and Community Right to Know Act (EPCRA) requires certain facilities to report the volume of pollutants released on an annual basis to the EPA's Toxic Release Inventory (TRI). The requirement to report to TRI is based on the following criteria:

¹ <https://www.epa.gov/controlling-air-pollution-oil-and-natural-gas-industry/basic-information-about-oil->

² Stefan Schwietzke, Owen A. Sherwood, Lori M. P. Bruhwiler, John B. Miller, Giuseppe Etiope, Edward J. Dlugokencky, Sylvia Englund Michel, Victoria A. Arling, Bruce H. Vaughn, James W. C. White & Pieter P. Tans. 2016. *Nature*. 538. p. 88-91. doi:10.1038/nature19797

RE: Idaho Conservation League comments on proposed permit to construct No. P-2016.0020 for Tesoro Logistics Operations

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- Is a specific industry sector facility as indicated by a North American Industry Classification System (NAICS) code
- Employs 10 or more full-time employees
- Manufactures, processes, or otherwise uses a TRI-listed chemical

Tesoro's facility appears to meet all of these criteria. Tesoro's NAICS code (424710) and a number of the hazardous pollutants being emitted by this facility are both listed under TRI. According to Tesoro's *2015 Social Responsibility Report*³, as of 2015 the company employs over 6,000 people. Further, Tesoro's Boise, ID, facility reports to the TRI.

Based on this evidence it appears this facility is required to report its emissions and should immediately take action to comply with Section 313 of EPCRA. Guidance on how to report to the TRI can be found on EPA's website⁴. Disclosure of this information is necessary to provide nearby residents vital information with regards to their health and well-being as well as providing communities, government agencies, companies, and others data necessary to make informed decision-making.

³ <https://tsocorpsite.files.wordpress.com/2016/06/2015-tesoro-sr-report.pdf>

⁴ <https://www.epa.gov/toxics-release-inventory-tri-program/reporting-tri-facilities>